

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LIBERTY MUTUAL INSURANCE COMPANY,)	CIVIL ACTION
)	NO. 96-10804-DPW
)	NO:1:04-CV:10678-DPW
Plaintiff,)	[Shaffer Landfill]
)	
v.)	
)	
THE BLACK & DECKER CORPORATION,)	
BLACK & DECKER, INC., BLACK & DECKER)	
(U.S.) INC., EMHART CORPORATION, and)	
EMHART INDUSTRIES, INC.,)	
)	
Defendants.)	

**ASSENTED TO MOTION FOR LEAVE TO FILE UNDER SEAL
BLACK & DECKER'S OPPOSITION TO LIBERTY MUTUAL INSURANCE
COMPANY'S SUPPLEMENTAL MOTION FOR SUMMARY JUDGMENT
WITH RESPECT TO THE SHAFFER LANDFILL SITE**

Black & Decker, with the assent of Liberty Mutual, moves, pursuant to Local Rule 7.2, for leave to file under seal its Opposition to Liberty Mutual Insurance Company's Supplemental Motion for Summary Judgment with respect to the Shaffer Landfill Site. This document contains references to confidential documents produced by the parties pursuant to protective orders designed to ensure the confidentiality of said documents. Pursuant to Local Rule 7.2, Black & Decker requests that this Court enter an Order authorizing the sealing of this document.

Black & Decker also requests that the Court maintain this document under seal

until this action is closed and, thereafter, that said document be returned to counsel.

By their attorneys,

Dated: November 24, 2004

/s/ Jack R. Pirozzolo
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